

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

<p>NORTH AMERICAN LAND DEVELOPMENT CORPORATION, LUV N' CARE, LTD., NOURI E. HAKIM, and JOSEPH H. HAKIM,</p> <p style="text-align: center;"><i>Plaintiffs,</i></p> <p style="text-align: center;">v.</p> <p>JACK RALPH HAKIM,</p> <p style="text-align: center;"><i>Defendant.</i></p>	<p>Case No.: 3:23-cv-00452</p> <p>Judge Terry A. Doughty</p> <p>Magistrate Judge Kayla D. McClusky</p>
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REQUEST FOR ENTRY OF DEFAULT JUDGMENT

Plaintiffs, North American Land Development Corporation, Luv n' care, Ltd., Nouri E. Hakim and Joseph H. Hakim hereby request the Clerk to enter a default against Defendant, Jack Ralph Hakim in the amount of \$1,766,398.59, together with Plaintiffs' reasonable attorneys' fees, costs and expenses as requested in the Complaint [Dkt. No. 1]. A supporting declaration in compliance with Rule 55(b)(1) is attached as Exhibit 1. Plaintiffs filed their Complaint on April 6, 2023. [Dkt. No. 1] seeking the aforementioned relief. On April 11, 2023, Defendant, Jack Ralph Hakim, who is neither incompetent or a minor, was served by personal service at 20201 East Country Club Drive, Unit 1110, Aventura, FL 33180 with the Summons [Dkt. No. 4] along with a copy of the Complaint, as evidenced by the Declaration (Acknowledgment of Service) filed on April 17, 2023 [Dkt. No. 5]. The 21-day (Rule 12(a)(1)(A)(ii), Federal Rules of Civil Procedure) deadline for Defendant to answer expired on May 2, 2023. Defendant, Jack Ralph Hakim has failed to file an answer to the complaint and therefore the record in this case demonstrates that there has been a failure to plead or otherwise defend as provided by Rule 55(a)

of the Federal Rules of Civil Procedure. Pursuant to Rule 55(b)(1), Plaintiffs therefore request entry of a default judgment against Defendant, Jack Ralph Hakim.

Respectfully submitted this 4th day of May, 2023.

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CERTIFICATE OF SERVICE

I certify that on this 4th day of May, 2023, a true and correct copy of the foregoing Motion for Entry of Default was served via Overnight Courier, postage prepaid, on defendant Jack Ralph Hakim 20201 East Country Club Drive, Unit 1110, Aventura, FL 33180.

/s/ Robert M. Chiaviello, Jr.
Robert M. Chiaviello, Jr.